GOLETA SLOUGH
Management Committee

Established 1991,
Santa Barbara County, CA

February 15, 2014

Coastal Commission
c/o SLR Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: California Coastal Commission Draft Sea Level Rise Policy Guidance Document

The Goleta Slough Management Committee (GSMC) was established in 1991 and since then has worked cooperatively with regulatory agencies, property owners and public interest groups to provide for a healthy Goleta Slough Ecosystem. GSMC continues to identify and resolve issues related to management of the Goleta Slough Ecosystem Management Area and serves in an advisory capacity to lead agencies (e.g., Cities, County, Coastal Commission and UC Regents). We are currently preparing an update to our plan that includes a Sea Level Rise Vulnerability Assessment so we were very interested in reviewing the Draft Sea Level Rise Policy Guidance document. More information about GSMC is available at www.goletaslough.org

The Goleta Slough Management Committee would like to provide the following comments on the Draft Sea Level Rise Policy Guidance document:

General Comments:

1. **Support for providing local jurisdictions' with policy guidance -** Sea Level Rise is an important issue that is being discussed up and down the state and the guidance the Coastal Commission is providing is appreciated and very helpful.

2. **Need for adequate staffing and funding to update LCPs -** We believe it is timely to support the inclusion of SLR policies in Local Coastal Programs and encourage the Commission to adequately staff this effort so that the LCP updates can be completed in a timely fashion. Additional funding for local jurisdictions to update their LCPs would also accelerate the process to include SLR policies their plans. Step 5 on p. 7 ("Develop or update LCP and certify with California Coastal Commission") is one of the most important steps in the update process and adequate funding for the Commission and local jurisdictions is the only way to achieve this.

3. **Updated LCP maps relating to SLR -** The funding provided should include sufficient funds to update various LCP maps that are potentially affected by SLR based on up-to-date information. With sea level rise, the Mean High Tide Line (MHTL) is moving inland and must be remapped as part of periodic LCP Updates ideally occurring every 5 years. This is critically important because it determines whether the CCC or the local government has original permit jurisdiction and approval authority over CDPs. Similarly, LCP maps of appeal jurisdictions must also be periodically updated as sea level rises and additional areas of wetlands are identified.

4. **Use of natural processes –** We support the focus on using the best available science to protect coastal resources and using natural processes rather than relying on coastal armoring.

5. **Sample SLR policies** – We are presently working on a SLR Vulnerability Assessment and anticipate writing policies for inclusion in our *Goleta Slough Ecosystem Management Plan.* We were disappointed to find that the SLR Policy Guidance did not include any sample policy language. This is a major oversight that should be corrected in the final document if it is to truly provide guidance to local jurisdictions and those interested in addressing SLR. Issues to be covered in the sample policies should include short term v. long term management strategies, increases in SLR that trigger further study and need for additional adaptation measures, etc. The sample policies need to recognize that it is very speculative to estimate SLR and its effects in a given timeframe (e.g., 2050 or 2100) and a better approach would be to base adaptations and other actions on observed increases in sea level over time. The City of Santa Cruz is to be has a Climate Adaptation Plan that includes goals and objectives that are a good place to start. (http://www.cityofsantacruz.com/Modules/ShowDocument.aspx?documentid=23643)

6. **Website that collects relevant SLR studies, policy documents, etc. –** It may be appropriate for the Coastal Commission to serve as a "clearinghouse" of all info relating to SLR including providing links to studies and LCPs that address the issue.

7. **Other effects of climate change and SLR** – There are many management strategies, habitats and processes that are directly and indirectly affected by climate change including increases in wildfire danger, flooding, ocean acidification, flooding, drought, coastal erosion and salt water intrusion. The guidance should give more consideration to these factors, especially as they relate to coastal hazards and impacts to coastal ecosystems.

8. **Recognition of competing interests and tradeoffs** – It is important for the Commission to include consideration of the numerous competing interests that could be affected by SLR including protecting habitat for state and federal endangered species, flood risks, health risks such as increases in mosquitos, potential damage to critical infrastructure and passive and active coastal recreation facilities and opportunities. Any adaptations that are pursued need to take a balanced approach that considers Coastal Act policies as well as other important priorities.

Specific Comments:

6. **Coastal armoring impacts to sand supply and access** – The guidance states that armoring may be allowed under certain circumstances (page 25, #10). We suggest you clarify that coastal armoring is allowed only when impacts to sand supply are avoided.

7. **Development in ESHA and mitigation** – We have two comments relating to ESHAs and mitigation. First, on page 26, #13, it should state that habitat mitigation must not be located in an area that would be threatened by SLR in the near term. Second, we encourage the Commission to be more flexible in terms of the type and location of habitat mitigation. We believe it is more appropriate to take an ecological and systems approach to mitigation rather than the "like kind of habitat or species mitigation onsite." Habitats do not respect jurisdictional lines and there is synergy in having contiguous habitats rather than isolated habitats that happen to be on the site where the impact is expected to occur.

8. **Changes in Sediment Supply and Movement** (p. 30) – One of the biggest changes as a result of SLR is how coastal planners look at sediment deposition. Given development and other changes in watersheds, increased runoff and sedimentation have been a problem for coastal

lagoons and marshes. However, SLR has changed how sediment is perceived as, when managed properly, it can help wetland systems keep pace with SLR so that valuable habitats and systems are not reduced significantly in size or eradicated. This is one of the policy areas that should be discussed in the guidance as outlined in #5 above.

9. **Wetland migration** – On p. 34, the guidance discusses the consequences of SLR on coastal resources including wetlands that may migrate inland to accommodate higher sea levels. It would be helpful to provide guidance to local jurisdictions relating to placing restrictions on the use of land in areas where wetlands are expected to migrate. Otherwise, these low-lying areas will be filled, and some types of wetlands may disappear.

Thank you for the opportunity to comment on this document.

Sincerely,

Pat Saley, AICP
Goleta Slough Management Committee